

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

LEAGUE OF CONSERVATION VOTERS <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 3:17-cv-00101-SLG
)	
DONALD J. TRUMP <i>et al.</i> ,)	
)	
<i>Defendants,</i>)	
)	
AMERICAN PETROLEUM INSTITUTE and STATE)	
OF ALASKA,)	
)	
<i>Intervenor-Defendants.</i>)	
)	

DECLARATION OF ROSEMARY AHTUANGARUAK

I, Rosemary Ahtuanguaruak, hereby declare as follows:

1. I was born in Fairbanks and I moved to the North Slope in 1980. I now live in Nuiqsut. In the past, I have lived in both Nuiqsut and Utqiagvik (formerly Barrow).

2. I attended the University of Washington Medex Northwest Physician Assistant program. I graduated in 1991 and was employed as a health aide in Nuiqsut for 14 years. In 2017, I received an Honorary Doctor of Humanities degree from the Oberlin College and Conservatory.

3. I am a current member of the Alaska Wilderness League (the League). I joined the League in April of 2008 to work with others whose work helps to protect where I live. I previously worked for the League as its Environmental Justice Advisor.

4. I helped to found REDOIL, Resisting Environmental Destruction on Indigenous Lands, originally a project of the Indigenous Environmental Network and now its own free-standing organization, and have been a member since REDOIL's inception. I have been a member of the Indigenous Environmental Network since 2000.

5. I support the League and REDOIL's work to protect the Arctic, including the National Petroleum Reserve-Alaska (Reserve) and the adjoining Beaufort and Chukchi Seas.

6. I am also involved with various entities involved in protecting our community and our health. These entities include the Center for Disease Control & Prevention's (CDC) National Tribal Health Think Tank, a group working to promote tribal public and environmental health issues in communities, including those on the North Slope. As part of this group, I have been able to address tribal environmental health concerns with various agencies. As explained below, I initially became involved with CDC because of fish contamination issues we were experiencing around Umiat.

7. I raised my family in Nuiqsut. I have one daughter, four sons, ten granddaughters, and eight grandsons. I live a very traditional lifestyle hunting, fishing, whaling, gathering and teaching our family and extended family and community members the traditional and cultural activities as my elders taught me. We hunt and eat various birds, including ptarmigan, ducks and geese, fish, including char, salmon, whitefish, dolly varden, grayling, pike, trout, and cisco, land mammals, including caribou, moose and muskox, and marine mammals, including bearded seals, walrus, and beluga and bowhead whales. We harvest berries, plants, roots and herbs. We work together in harvesting plants and animals and sharing the harvest.

8. We have extensive sharing traditions that unite our families and communities across the North Slope and beyond. Others share their harvest with my family and we share our harvest with others, including extended family members in other places. Other villages share their harvest with the people of Utqiagvik and the people of Utqiagvik in turn share their harvest with us. These extensive sharing patterns have given us much of the variety we eat. We hunt much of our own food, but others share unique items such as beluga whale and walrus meat. We send cisco, caribou, moose, muskox, or bowhead to others. We also share our harvest with those in need. When my mother fell ill, villages across the North Slope reached out to her to make sure she had fermented walrus and others foods she wanted.

9. My mother taught me the land hunting skills that she learned from her parents and family. Other extended family members taught me how to hunt whales and other marine mammals. I also learned the ways of preparing and preserving the foods, including how to ferment fish and walrus and whale meat, and how to prepare caribou meat by burying it in the snow. I have family ties that bind me to Utqiagvik and other communities in the Arctic, and exposure to hunting and gathering is an important part of these ties.

10. My family and I hunt, fish, and gather across the North Slope, including in various places along the Chukchi and Beaufort Sea coasts, multiple tributaries including the Colville River, and throughout the lands and waters around Nuiqsut and Utqiagvik. We have also hunted and gathered in Wainwright, Kaktovik, Atkasuk, Pt. Hope, Pt. Lay, and Anaktuvuk Pass. Our families have Native Allotments throughout the Teshekpuk Lake area and a cabin five miles from Utqiagvik. We travel with family and friends to hunt and harvest in all these places. My family shares all types of foods with me as I share foods with them. We share at potluck and feasts and receive from them too.

11. Our family has a cabin eight miles from Nuiqsut. This cabin is located across the river from where the Alpine oilfield was built. Before the oilfield, this used to be our preferred place to hunt caribou and geese. The activity levels around the cabin are so high that hunting around there is greatly impacted; there are too many overflights, airboats, freighters, track vehicle traffic, and personnel contact for our boys to hope to get caribou near the cabin. Also, my oldest grandson who is now 10 years old, could not get a caribou there. These changes are affecting how our uncles are teaching our nephews to hunt in our traditional use areas. Caribou are not staying in areas around the cabin for insect relief, like they used to. Other community members have also noticed this and share this concern with us. We feel that the increased activities such as overflights are causing the caribou to avoid the area, forcing us to travel elsewhere to hunt for them. We still use the cabin as a stop-over place, and for fishing in tributaries that are away from the cabin, although my youngest son has stopped taking his nieces and nephews there altogether. I am concerned that disturbances to nesting grounds from oil and gas activities are also affecting the density of birds in our traditional hunting grounds near the cabin. We are not harvesting as many ducks and geese as we used to do. Our elders have

expressed concerns about the reduced numbers of birds and also for some species that have failed to return. Just like with fishing and caribou hunting, we now have to travel elsewhere and increase our efforts to get our birds. Due to the added travel and effort, our local hunts, including for caribou, require burning many more gallons of gas per year. There is an impact mitigation fund that was established to address these types of conflicts between oil and gas activities and hunting, but the funds are not sufficient to mitigate the actual costs we are experiencing due to more extended travel and increased effort. Because of decreased harvests near the cabin, we cannot share our foods with our extended families as we used to do and we also have less to consume ourselves. This raises concerns for our long-term health due to the failure to meet our traditional nutritional needs.

12. My second youngest son was brought to the same area, near the cabin, where his dad caught his first caribou. My son shot a caribou there, but the wounded animal fled from a helicopter flying overhead, and moved into a water filled gravel pit, created for development of the Alpine oilfield, and drowned where we could not get to it. The conflict between attempting to harvest and share a successful hunt with the elders and members of the village and that of oil and gas development in our areas of traditional and cultural use changed my son's desire to attempt to hunt for many summers. Logical understanding that hunting around oil and gas development, including visualizing increased flight activities and vehicle traffic and contact with more and more people associated with the Alpine Development Unit in historically traditional and cultural use areas, leads to loss of harvest was a difficult lesson for him to learn at eleven and affected his hopes for future hunts. During the past decade or so, caribou herds do not migrate through the village of Nuiqsut as they used to. For this reason, our two youngest boys grew up not seeing the migrations through the village, experiences that our older children had. During

the last couple of years the caribou have showed up again. We have seen increased helicopter activity before the animals show up. We think this might be because the oil companies are herding the animals.

13. My second youngest son was excited to move to Utqiagvik with the hopes to have lands and waters less impacted by industry to hunt and gather in. He saw the changes had less impact the first couple of years. However, the changes have impacted the herds of the North Slope and declines in numbers have caused him to travel hundreds of miles in each trip to try to harvest caribou. He travelled to Atkasuk and Wainwright travelling 328 miles in one trip. He did this trip 3 times in 2015. The last few years, in March, he has had to travel over 300 miles to get his caribou. One year, he was delayed on his return and we had to alert the search and rescue. The rescue plane was about to leave when he finally got home, with a broken arm. These extended hunting trips have greatly increased the stress in our family for his health and safety. We, and others who are similarly situated, also feel an increased reliance and dependence on search and rescue services and other technological advances.

14. My son knows the changes he saw in Nuiqsut and the changes that came from Shell's increasing activity in Utqiagvik and all along the coast in connection with its past drilling plans have caused him great concern. For example, he saw during the first couple of years of living there that Utqiagvik did not have as many flights in traditional use areas, but this increased over time due to Shell's increased exploration activities. He saw during the first couple of years living in Utqiagvik that there were fewer interactions with personnel coming into traditional use areas for activities such as monitoring, permitting, research, and resource exploration activities, but this increased over time as well. He also saw less outsider boat activities when first arriving in Utqiagvik, something that has increased over time with Shell's exploration efforts and has a

negative impact on his traditional and cultural uses. He wanted to get out and hunt as much as he could because he listened to the helicopters and planes in Utqiagvik and knew the impact it would have on his hunting. He would be very frustrated as the lessons of his childhood were repeated around Utqiagvik and the surrounding areas. He is an Inupiat by blood and his ancestry is in conflict with the changes to the lands and waters affecting the seasons of living with the animals we depend upon. One change he's seen is that in 2015, for the first time ever, we have restrictions across the North Slope on caribou harvest. And that same year there was another proposal to cancel moose hunts. He has turned to some of the social ills of dealing with his conflict and makes known his frustrations.

15. In previous years, helicopters have affected hunting activities, increasing the danger to hunters. Once when my ex-husband and I and two of my sons went to harvest caribou, we could not find any caribou, but we were able to hunt muskox, which is more territorial. There was a helicopter flying overhead that was using a route not identified in the industry's plans. After my ex-husband shot a muskox, the herd was disrupted by the helicopter and charged the hunters, causing my family to flee to our boat.

16. I have owned a harpoon since 1982. I have shared this harpoon with a whaling crew in Utqiagvik, receiving a share of the whale from their harvest. Sometimes I participate in the Utqiagvik hunt, which occurs in the spring and perhaps again in the fall, if the quota allows. Other times, the whalers send meat to me. I have been out on the ice during whale hunts in Utqiagvik many times. I have helped to butcher whale in Utqiagvik and have shared in the community whale feasts in Utqiagvik.

17. I have also shared my harpoon with whaling crews from Nuiqsut. I have received whale from Nuiqsut whalers for the use of my harpoon. Nuiqsut whalers hunt for whales in the

Beaufort Sea during the fall. We await the migration of the whales from Camden Bay for this hunt. The crews go to Cross Island in August. My sons help the crews with their preparation, but have not gone to the island yet. My youngest son went spring whaling in Utqiagvik a few years ago. My ex-husband has gone whaling from Cross Island with his uncle a few times, and has struck two whales with my harpoon.

18. There is a feast in the village when a whale is caught by Nuiqsut whalers. A portion of the whale is cooked up when the whale is first brought to town. Everyone is invited to the successful captain's home to eat whale meat and other foods, teas and coffee. I have participated in several of these feasts in Nuiqsut. These feasts are a time of celebration, when stories are told about the hunt.

19. We have a unique sharing system to divide the harvested whale among the crew striking the whale and the crews helping to land and butcher the whale. The whalers set aside a portion of the whale meat to share with those in need.

20. Part of the catch is saved for feasting. We share the feast at the blanket toss—a traditional celebration during the summer—as well as Thanksgiving and Christmas. Families come to the feast area with utensils and receive their contribution of muktaq, meat, kidney, heart, tongue, intestine and flipper. The families get a share for each person and we eat together as well as take some home for later personal use. We bring some of the whale to share with those in need.

21. In Nuiqsut and Utqiagvik, much of the year is planned around the whale hunt, with preparations during all seasons needed to help a hunt succeed. The work is divided amongst the crew members, and extended family networks pitch in. I feel that the joy of the harvest and the sharing of the whale bind the communities together. Whale feeds families

throughout the long, dark winter, and provides nourishment, warmth and fuel for our daily activities during the Arctic winter.

22. Like whales, seals are also important to our culture and our traditions. There can be many seals in the nearshore waters around Oliktok Point and the mouth of the Colville River during the open water period in the summer, especially in July, when they follow fish that are running up the river to spawn. We usually see the most seals in the area when the fish are running up the Colville River to spawn in mid to late July. During this time, spotted and ringed seals gather near the mouth of the river in larger numbers than usual. The ringed seals will even try to follow fish upstream. I have seen several ringed seals upriver. It seems that they are attracted to the food source provided by the fish run. These seals must come to the area from other parts of the Beaufort Sea, because when I have visited this area at other times of the year I have not seen as many seals in this area.

23. I have been to Oliktok Point and the mouth of the Colville River on many occasions to hunt for seals. One year, in July, I took my grandson on a three day trip to the ocean. We camped at Oliktok Point. We saw more than 40 seals in the water between Oliktok Point and Nuiqsapiat, about 20 miles to the northeast of Nuiqsut. We hunted for bearded and spotted seals, and followed the seals into the waters where the mouth of the Colville meets the ocean. Unfortunately, we were unable to catch any seals during that trip. We also brought a fishnet with us and put it out to catch whitefish that were running up the Colville at that time.

24. During other trips to that area, attempts to hunt for seals have been more successful. For example, during two summers several years ago, I took children to the area between the Colville River and Oliktok Point to camp as part of the Arctic Slope Native Association summer camp. Children from all seven communities on the North Slope came to the

camp to learn our traditional culture. During that time, the campers caught a spotted seal in the waters between Oliktok Point and the mouth of the Colville River. When they returned to camp with the seal, I cooked it and we all shared the meal.

25. We make a delicacy called Kingitak, which is dried bearded seal meat in seal oil and blubber. My children and I enjoy this food and we eat a limited amount to make it last. It is harder to get bearded seals in the coastal waters near Nuiqsut than in other areas of the Beaufort Sea, so we often trade Arctic cisco to extended families in many places in exchange for bearded seal.

26. In the last few years, we have seen an increase in seal harvests. We are unsure what this trend means, including for other villages, and we are wary about it. We think that changes in sea ice are affecting fish and thereby the seals. With the increased seal harvests, we are concerned about increased conflicts with non-subsistence activities. For example, in recent years, our hunters entering the traditional seal hunting areas near Oliktok Point have encountered more and more non-subsistence boats in the area. These boats are there to do monitoring or to support other industry-related activities. Our seal hunters are increasingly getting into conflict with these other boats. The impact mitigation funds allow families to travel further out to the ocean to hunt, but this takes them away from their preferred hunting areas and is also more hazardous due to longer travel, deeper water, and changes in the ice conditions.

27. The foods we eat are important to our lives and health. We have activities associated with our harvesting throughout the year, such as skin sewing, sinew preparation, and craft making. The teaching of the activities and stories continues throughout the year with each generation sharing family hunting stories and such.

28. I embrace the traditional and cultural activities that I learned from my elders and extended family members. Sharing and passing these traditions onto my children, grandchildren and families is very important to me. I fear that industrial oil and gas exploration and development activities in our lands and waters, including the Arctic Ocean and the Reserve, will continue to change our natural environment in negative ways and thereby affecting my ability to live and to effectively share and pass on our traditional way of life. Increased contact with unnatural activities, like those in oil and gas exploration, causes a cascade of reactions. Taking the next generation hunting and fishing in areas that now feature signs and sounds of industrial activity – gravel placement, flight activity, and more boat and personnel activity – is not the same. Our animals change because of these changes in their environment. The image of the great caribou herds, for example, does not show how our daily lives and our culture change because of these oil and gas proposals. There is a growing need to work in cultural camps that teach the next generation our hunting traditions. But teaching the young harvesters our traditions is getting harder because the animals, including caribou, whales, seals, and birds, have been pushed away from our traditional use areas and because there are increasing conflicts with non-traditional activities and uses in these areas. These competing and conflicting activities, both on land and offshore, are deeply and adversely affecting us, our animals, our culture, and our ability to pass on our traditions to our future generations.

29. Our grandparents tried to warn us of the impacts that fossil fuel activities would have on our lands and in our waters. Our parents lived these impacts. And now, my generation is sharing these lived impacts with our children and our grandchildren.

30. Alpine Development Unit has affected our cultural camp at Nigliq and on the Colville River. Both areas have been changed by oil and gas development activities. Our camp

and traditional story telling are changing with the generations, with the expansion of the Alpine development, and changing how we use the land and our teachings. We have to find new ways to educate our youth about our traditional and cultural activities such as trying to teach a child to cut up a caribou from pictures and words. We have to become very creative in our efforts to share with our youth our knowledge of our traditions. Because of how these changes have affected our camp, we are limited in what our young campers brought back to their families. Encouraging the sharing of the hunting is affected. Traditional story telling is affected. As families change their activities to adapt to oil and gas activities, this causes gaps in story-telling and prevents natural discussions about our traditional and cultural uses from growing. Instead our children are learning how our elders used areas and how my generation's usage changed, and the children I taught will be faced with more changes. How will we take care of the future if the current generations don't use the lands and waters the way our elders and my generation do and the importance of traditional and cultural uses are lost? When activities from the expanding outer continental shelf oil and gas exploration activities conflict with our traditional and cultural activities and are permitted to dominate our landscape, the traditional usage of the areas that has persisted for generations loses out.

31. During previous cultural camps, our elders have noted how much the camps have changed since the arrival of the development activities at the Alpine oil field complex. One year, an elder also felt the changes in a very tangible way: when the boat got closer to the camp, and passed the complex where flaring was taking place, her breathing was affected. The same thing happened upon return from the camp. Since then, we have heard similar stories from other community members. By failing to enforce the air quality regulations, the federal, state, and borough agencies are subjecting our people to hazardous air conditions. The industry's air

quality monitoring project, with its modeling data, will not prevent our exposures and will continue to increase our adverse health risks.

32. We have experienced so many changes around Nuiqsut and in our traditional hunting and fishing areas due to the oil and gas activities in the Reserve and the surrounding lands. We have seen ice roads devastate the tundra and fish that were sucked up from the lakes stuck on the ice roads because of failed screens on the water withdrawal pumps. Due to the water withdrawals, our hunters and fishers have seen water levels drop in the affected lakes. This affects the ice formation on the lakes and creates pockets that break down as we cross the lakes along our traditional routes. Our elders have said that prepacking ice roads too early compacts soils and affects seasonal waterways that the fish use as migration paths. I heard a story from an elder who caught over 300 broad whitefish in a lake that typically only gave 5-15 fish. This meant that the fish were stuck in the lake because their migratory path was severed. It has also been hard to see how our village is now completely surrounded by lights from the oil and gas infrastructure. In 1986, the closest lights were 60 miles away; now they are all around us. The Putu development is happening literally outside our doors. We have also experienced concerns of damage to our camp areas and equipment. Once, a tracked vehicle from the Alpine facility went off their approved transportation route and ran into our camp and right over the platform for our tent. Some of our berry and plant picking areas are being converted into runways and other infrastructure. Our animals are being deflected and birds forced away and new predators, like foxes, introduced because of the oil and gas activities. Last but not least, oil and gas development on our lands has also created conflicts and division among our people. These conflicts are breaking the unity of our communities. We are losing out on so many levels.

33. Through the continued involvement of watching changes to lands and waters, we see many changes being discussed. Suffering through the changes to the east, north, and west of our village, we cannot allow the south to be developed the same fashion. The south side of our village currently allows migration of animals, including caribou, birds, and fish, to our village. We cannot allow the piecemeal changes to devastate our way of life and we must prevent any further activities on the east side of the GMT-2 proposed road until the process has come back to our village to discuss and plan how staggering of development would look like as well as identifying the restoration of migratory routes that are currently being impacted by the existing exploration and development activities.

34. There is a stark disconnect between our concerns and the continual government permitting of oil and gas activities in our region. Generations of our people have discussed and put together comments, mitigation measures, restrictions, prevention attempts, etc. Yet in attempts to streamline development, the government has not prevented the loss of traditional and cultural activities, impacts that the Council on Environmental Quality for the Bush administration told us were illegal. The Obama administration allowed activities to continue until it finally did the right thing by withdrawing most of the Arctic Ocean from oil and gas leasing, exploration and development. And now the Trump Administration wants to take us right back where we were, push opening the ocean for more oil and gas exploration and development without any concern for losses and risks that these activities create for us. At the same time, Bureau of Land Management's (BLM) decisions to offer oil and gas lease sales in the Reserve and President Trump's decision to revoke the Arctic Ocean withdrawals threaten our lands with more exploration and development activities, more greenhouse gases and worsening climate change impacts, and thus, increasing risks to our life, health, safety, and traditions and culture.

Instead of regional stability, these poor decisions are creating more instability, more division, while avoiding to look the cumulative impacts of all these decisions on our lands, waters, life, health, safety, and traditional culture. Decades of work by our people and others to defend our home and our life, health, and safety, and traditions, culture, and our future, are dismissed once again. These issues and concerns that we speak of are constant, urgent, and fundamental to our existence. They do not change with the changes in administrations. It is time we secure our lands and waters, the health, safety and traditional culture of our people, in a way that does not leave it up to any new administration to act in ways that undermine them.

35. We have already lost harvests of whales, caribou, and other animals in our traditional hunting areas due to oil and gas activities. This affects the health of our people and hurts our transfer of knowledge to future generations. Hotdogs offered by industry in their meetings cannot replace the loss of our traditional and cultural foods.

36. Oil and gas activities are affecting our animals. For example, during the seismic activity and exploration drilling in Camden Bay in the early 1990's, the whales struck by Nuiqsut whalers were between 18 and 25 miles off of Cross Island. In previous years, whales were struck within 10 miles of the island. One whale was struck and lost due to the weather turning bad during towing of the whale. The crew abandoned the whale in order to make it to shore as the increase in current was pulling the harvest back to the ocean. Once a whale is struck, even if it is then lost, it counts towards Nuiqsut's annual quota. The community also lost two boats that year. One was struck by a whale during the hunt and damaged beyond use. The whalers made it to an ice floe to stay afloat. Another boat was lost when the whale it had struck was lifted to the surface by a second whale. This caused the harpoon line to become entangled in the prop and the weight of the whale sunk the boat in minutes. The crew made it to a second boat, the last of

them escaping just before the nose of the damaged ship went under. I believe that the noise from the drilling and seismic activity agitated the whales and made them more aggressive. The whales were migrating further from the island, which increased the distance that hunters had to travel, the time it took to return to shore with a whale. The harvest was diminished that year, as more of the meat spoiled before the whale could be brought to shore and butchered.

37. The following winter, I heard of an unusually high rate of domestic violence in Nuiqsut and increases in suicide attempts and in suicides. I heard of and witnessed increases in drug and alcohol use as well. As a community health aid, I listened to people's stories of how difficult it was to hunt without success and the lack of resources and help from a food bank. The winter was the worst I spent as a community health aide and that experience helped me to get busy and to speak out at meetings about oil development.

38. Climate change is having huge impacts on our lives. We have more rain and ice fog because of the open ocean. Torrential rains and hydrology changes are causing erosion, including right here in Nuiqsut and along Colville River. Erosion is affecting our transportation routes, including on the Colville River. We are also experiencing more sink holes and permafrost thaw. We've seen entire lakes disappear. Every single ice cellar we have has been affected by permafrost thaw. We got one community freezer but learned it could only fit one whale, not more. We are trying to modify our ice cellars, and the ways in which we use them, to counter the warming. We make them deeper, we pack them with snow, we add covers to create a buffer, and we change when we put food in there and when we take food out. We also have to store more food in freezers and prepare our food differently to counter the lack of reliable ice cellars. We pickle and smoke more now, which means we have to build smokehouses and get more wood. All of this takes a lot of extra effort.

39. Climate change is also having a toll on our animals. We are seeing more parasites on caribou and fish; also more lesions on caribou and sores on seals. Over the last couple of years, we have seen an increase in fish mold, notably in broad whitefish, because of rising water temperatures. Over the last ten years, around June and July, I have measure water temperatures in the Colville River; it has reached up to 70 degrees F. Caribou near our village are smaller. We are seeing species, like beavers, river rats, and bugs, north of Brooks Range that did not use to be here. The torrential rains and the resulting erosion in the Colville River banks are destroying peregrine falcon and bald eagle nests, including ones with chicks in them. I've seen it with my own eyes.

40. We are also having rain on snow events. We see bloody caribou trails that result when caribou break through the crust and break their hooves. These trails make it easy for predators to find them. It is also easier for us to hunt them but it is psychologically hard for me to see them suffer like that. Increased rain and rain on snow events are also affecting us; our hunting and fishing trips are more dangerous because of wet conditions. We have to protect our snow machines and other equipment from water.

41. Now, with Trump's decision to reopen the Arctic Ocean for more oil and gas, the fears again reverberate through our people and our communities. While various social programs have been put in place to mitigate the impacts of oil and gas activities on our people, I fear we will still pay the highest price for our nation's energy decisions. I pray that the life, health, and safety of our people will not be the accepted price for our energy policies.

42. President Trump's attempted revocation of Obama's decision to withdraw the Arctic Ocean from oil and gas leasing is a major concern to me. It will expedite and spur further exploration and development activities in the Beaufort and Chukchi Seas and prevent us from

effectively protecting ourselves from these activities. These activities are detrimental to the traditional and cultural activities of our family and village, especially if these activities cause harm to whales and other marine mammals or result in an oil spill. We depend on traditional and cultural foods that migrate through both the Beaufort and Chukchi seas. Any harm from oil and gas activities, especially from seismic exploration and oil spills, to our resources, including bowhead, seals, fish and caribou, threatens our food and our health. When we are unable to harvest our traditional foods, we will have to find other ways to supplement our traditional diet. We will have to learn about these new foods, how to prepare these new foods, and how to pay for these foods. We are feeling it in our bodies when we are not getting the same value of nourishment and energy from other foods as we do from our traditional foods. We are seeing increased health problems and I believe they are related to not eating our traditional foods and living our traditional lifestyles.

43. I am concerned, as has been confirmed by past activities, that that oil and gas exploration and drilling activities will continue to harm our animals and their habitats. Seismic exploration and drilling, icebreaking, aircraft and helicopter flights, and other noisy activities in the Arctic Ocean will keep whales from their feeding areas or otherwise harm them. Any changes in the animal populations affect our hunters and whalers, including myself. We educate our families that a whale hunt must be respectful and quiet. If the noise from oil and gas activities causes our animals to move away from our traditional hunting and whaling grounds, I am concerned because this places more wear on our equipment and puts the hunters and whalers at greater risk.

44. I have similar concerns about how seismic surveys and other oil and gas activities in the Beaufort and Chukchi seas harm seals, as they have in the past. I worry that the noise and

disturbance from these activities could hurt seals or cause seals to abandon the nearshore waters. If seals that I would otherwise hunt are harmed by these activities, and this interfered with my ability to hunt those seals, this would harm me personally. Harm to the animals that my family and I hunt is direct harm to a resource that I depend on. Such harm, therefore, also injures me and impairs my ability to live the traditional subsistence lifestyle that has been passed down to me from my elders and to provide for my nutrition and that of my family and community.

45. Finally, I am also concerned that seismic surveys may harm fish in the areas around the seismic boats. In the past, during seismic activities, we have seen fish wash up on shore. Any harm on the fish will adversely affect our harvest of fish, including those fish that travel between the Beaufort and Chukchi seas. This could also result in harm to the ecosystem, the seals and birds that feed on these fish and, in turn, to me and my family and my community. We are concerned about the rebound effects of the seismic surveys, as well as research and monitoring surveys, on the whole ecosystem.

46. We have been taught not to put things in the water that may cause harm to our animals, including cause whales to turn away from the hunting grounds. I fear that oil drilling activities result in water discharges from drill ships or the presence of drilling muds in the water that could cause whales to avoid our hunting grounds.

47. When whale hunts are less successful, the community will suffer, as it has in the past during times of shortage. Much of our year is planned around the whale hunt and if the hunt is unsuccessful, many of our traditional cultural activities and community celebrations are affected. Our experiences have proven that our seasons of cultural traditions and preparations for success will change to seasons of fear and unpreparedness and the real hardship of empty

food cellars. When whale meat is less available, our nutrition suffers as many mothers give the food to the hunter and the children first.

48. If there is a spill and our animals become sick, I am concerned about how we will feed our families into the future and how we will be able to share our foods as our elders taught us. After the Exxon Valdez spill, we shared our foods with friends and families from boarding school days that were affected. If there is a spill in the Arctic, I wonder if others will share their foods with us when we all cannot get enough.

49. I remember a local community meeting concerning oil and gas development in Umiat. There were concerns about levels of contaminants in fish, near the Umiat area, from earlier oil and gas development activities. Samples of the fish were being taken, but we were told not to worry because there was food in the lower 48 that had higher levels of contaminants. We were told about the health effects these contaminants can have on people who are exposed to them. The liver had the highest levels yet we eat the liver as a delicacy and for its high fat content. We share this with our elders and our grandchildren, two very sensitive populations that could have adverse effects from eating contaminated livers. After the meeting, a village member came to me crying. Her elder had gotten sick and had a severe neurological event similar to what was described in the meeting. She asked me if she caused the elder to get sick because she had shared this fish with her all winter. I tried to reassure her, but without efforts to adequately monitor our foods, I cannot be sure. I am afraid that we will have to worry about contaminants and the impacts on our health if there is a spill in the Arctic Ocean. As mentioned above, it was the Umiat fish contamination issues that resulted in my involvement with CDC, including the National Tribal Health Think Tank.

50. I am concerned that helicopters and aircraft associated with both onshore and offshore exploration and development activities will continue to adversely affect caribou, including along the coast, and make the caribou avoid hunting areas, including traditional migratory routes and areas used for insect relief. I am concerned that helicopters could affect caribou hunts. I fear that helicopters might even endanger caribou and/or muskox hunters including members of my family, as they have in the past.

51. I am very concerned that the oil companies and the government are ill-equipped and unprepared to prevent and clean up an oil spill in the Arctic. I am very concerned that spill plans, as written on paper, will not work and I also worry about the lack of enforcement and regulatory resources if these plans do not work. How can promises of “not one drop” be honored and not be broken when industry can cut costs to increase profits, leaving broken pipes at existing infrastructure that leak oil? An oil spill, whether on land or in the Ocean, will cause harm to our fish and other animals and to our communities that rely on these resources.

52. I am worried about the possibility of a well blow out as was experienced in early 2012 on the Colville Delta. I am worried about the exposures from that blowout and the failure to get adequate safety, monitoring, prevention, and containment processes in place. I am worried that decision-makers have failed to learn from the Repsol event and have not be take the mistakes from it into account in the decision making process for opening our lands and waters for more leasing and oil and gas activities. I am worried about damage that oil could to do to the tundra, lakes, rivers, and to the Beaufort and Chukchi seas and coastal areas, including important traditional use areas for Nuiqsut. I am concerned about the risks to our traditional diet, caribou, fish, birds, and marine mammals, from oil and the chemicals used in oil and gas exploration and development. I am concerned for impacts on marine mammals such as the walrus who dig in the

shoals for food, from the dumping of discharges into the water. We should not depend on the currents to mix the discharges when Arctic mixing zones and associated tribal health risks are not fully understood. I am concerned that there are no animal resource centers on the North Slope that will be able to respond appropriately to the wildlife needs if there is a spill.

53. I am concerned that the Trump Administration will not require appropriate safety measures to prevent a spill and will not be able to stop a leak. I am concerned that the oil companies are allowed to drill without adequate containment supplies and support from village response teams. As for seismic, I have equally little faith in the Administration's desire to ensure that any seismic exploration activities are conducted in a manner that does not harm marine mammals, including whales and seals, and fish that I depend for food, health, life, and my traditional culture. President Trump's collective efforts to cut key agencies, including BOEM, BSEE, EPA, and CDC, and to undermine environmental protections, pose serious threats to me and my communities.

54. When oil and gas activities are permitted, whether on land or offshore, it is not a matter of "if" but "when" oil spills will happen. This was painfully demonstrated by the Deepwater Horizon spill in the Gulf of Mexico, and also by the Exxon Valdez spill. Watching the failure to stop the Deepwater Horizon spill really affected the psyche of our people. We are greatly stressed about, it is bringing out anger and fear, and it is breaking down our ability to work effectively together. When there will be a spill from oil drilling activities in the Arctic, the immediate risks to the people, our lands and waters, and the wildlife are severe and real. Many animals, like whales and birds, come to the Arctic for renewal of the next generations. When spills occur during this time, generations of these animals may be affected. Whole populations could collapse. We would then have to work to identify and assess any health changes to our

animals, and find the resources, facilities, and equipment to do these assessments. We might have to find alternate food. These effects would be profound and long lasting.

55. I am also concerned that we are not properly assessing and proactively preparing for the health effects that an oil spill will have on us. Past efforts to assess those impacts, notably the Health Impact Assessment relating to the NPR-A, were not done in consultation with us and thus did not reflect all our concerns. The health impact assessment does not tell us what the impacts to our health are from oil and gas activities, including spills. This information still needs to be collected. There is data for specific years that show impacts but that data was excluded from the assessment. There are no criteria in the documents to flag oil and gas concerns, including effects from flaring. Instead, they focus on smoking. We questioned how this will be interpreted without data specific to oil and gas activities. Because the models and data are controlled by the industry, the outcomes always come out to favor the industry, not us. I am concerned that the Trump Administration will not be concerned with doing such proactive health impact analyses either. I also worry that oil companies lack appropriate village notification processes and resources to monitor, assess, and help villagers protect their health when there is a spill.

56. Oil and gas development creates health issues for our people and in our communities. I saw and heard friends and family get sick during the Repsol blow out. I have talked to others who were sickened, some who have since died, by the efforts to clean up the Exxon Valdez spill. When there is a spill in the Arctic, I worry that our people will suffer from illness as the people who responded to that spill did.

57. At every meeting we attend, we elevate our health concerns. I am concerned that decisions about the effects of oil and gas activities are being made without adequate knowledge

of the impacts on the health of our people. We have no specialized health care assessments to assess the impacts from oil and gas activities and no guiding points to help make decisions based on the best for the health of the people who live where these activities are to occur. How will our health concerns be met? Who will help the diabetics, heart patients, and those with respiratory illness and educate them on how to protect themselves from the effects of oil and gas activities? Who will counsel people for social reactions to oil exploration and development and an oil spill? We have done so and we will continue to do so, but our resources are limited. We do not have the health care resources to deal with changes to our health that may be caused by oil and gas activities. Taking our people from our community to other areas is costly. I am worried that many of our people will have decreased longevity because of adverse health issues resulting from pollution and contamination. Oil exploration and drilling activities, and the effects of those activities, may compound our health issues without providing us resources to address them appropriately. I worry that we will have serious changes in our health if we are unable to live our traditional and cultural ways because changes brought to our lives and our environment by oil and gas activities.

58. I have received calls from community members in every community in the Arctic and I have listened to their questions and concerns about past drilling activities and the possibility of an oil spill and what community members can do to help keep us all safe. I listened to many concerns from our people when we had the rare algae plume that was mistaken for an oil spill. These concerns have caused stress, anger, and frustration. They have caused many sleepless nights, difficult meetings and the breakdown in the unity of our communities over the divisive issues of oil and gas development, and much hard work to keep our families united together. These concerns have taken time away from my and others ability to practice our

traditional and cultural activities and from our families. Many people are worried that our traditional way of life may be over, and thank me for trying to protect it.

59. The changes to our villages that could happen due to oil and gas exploration and development are severe to think about for me. I see the real frustration in our villages as people get drunk and talk on the VHF radios venting their frustrations and fears. I worry about the increase of drugs and alcoholism and the neglect and abuse that follows. I was recently asked to visualize all the things I have gone through over the last 20 years in trying to stand up for our people and then amplify those experiences to next 20 years. This visioning exercise made me terribly upset and concerned for our future. It made me realize that without significant protective measures put in place now, we will not survive the difficulties we will face in trying to protect the life, health, safety, and traditional culture of our people.

60. I have learned from aboriginal people in Russia and Nigeria's experiences from Shell's oil and gas development projects, and have learned about serious environmental degradation, health impacts, social impacts, and conflicts with traditional and cultural activities caused by oil development and spills in these areas.

61. I toured the Gulf of Mexico after the spill and saw a spill plan, like the ones Shell has used in the Arctic, in action. In the Gulf, I learned about ineffective boom placement, lack of maintenance of response equipment, inconsistent protective measures for special areas, and the lack of protective measure for workers. I saw uncoordinated response efforts, a lack of transparency, and empty promises to those at risk for losing the most. I saw divisions among the people and profit-making, not public health, as guiding decisions. It gives me no reassurance that oil companies allowed to operate here can protect the Arctic in our harsh atmosphere, icy waters, extensive darkness, and without infrastructure and Coast Guard presence.

62. I can still see the eyes of the people who lived in the Gulf of Mexico and were working to try to respond to the spill. I remember the haunting look in their eyes of wanting to protect their homes and livelihoods against the odds with the dread of knowing what they were responding to and of what they were losing every minute. I have seen this same fear and anger in our people's eyes as they see the efforts to expand oil and gas development on our lands and waters. The faces I saw in the Gulf as boats were taken out of the water on the first day of shrimp season are not the faces I want to see in the Arctic or on our people during whaling.

63. Seeing the response in the Gulf confirmed to me the importance of our traditional knowledge. Our traditional knowledge and experiences in travelling in our lands and waters conflict with the words in these spill plan documents. I am concerned that the oil companies and the government are ill-equipped to protect the Arctic and lack a true understanding of our areas to be able to protect them from an oil spill. I am concerned that there is a lack of understanding in the spill plans themselves, in the decisions to approve the spill plans, and in the decisions to allow oil and gas drilling activities to occur in the Arctic Ocean about the importance and vitality of the Arctic Ocean ecosystem, the inter-relationships between the environment and the migratory animals that depend upon it, and the necessity of critical habitat for wildlife, and how oil and gas activities. I am concerned that the impacts from an oil spill and the recovery methods used to clean up a spill on the Arctic Ocean are not fully understood and may have a negative effect on the ecosystem.

64. I have seen and heard about failures in spill response drills when they have been conducted in the Arctic. I have heard about failures of recovery equipment when they have been deployed for testing. I am concerned that these failures show a basic lack of understanding the Arctic environment. Because of this lack of understanding about our lands and waters, I am

concerned that this has prevented adequate efforts to ensure effective spill response materials are in place in the Arctic, and I am concerned that these materials will not be maintained effectively. I am concerned that distribution of response equipment to protect tribal areas is almost non-existent. If there is a spill, I am also concerned that that our community members, who have volunteered for decades to be part of village response teams, will not be called out to help.

65. I am concerned about the effects of dispersants on our communities and our animals. As more information is learned from the effects of the Gulf of Mexico, I have learned more about the chemicals in dispersants and their health effects. I fear that chemical companies and decision-makers are ignoring health concerns, and our people will be negatively affected if dispersants are used to clean-up a spill in the Arctic or along the migratory paths of our animals. I am concerned to the effects the Gulf of Alaska spill and the Gulf of Mexico spill has on the migrating birds and the study that shows egg shells are showing contamination. I worry how the migration of these birds is affected and the health of our people eating them. I worry how the new generations of birds will be continued to be impacted during their migrations through these areas. I worry what the contaminants in the egg shells accumulating in the birthing area of the birds will do to future generations. I learned from elders how some of our birds have never come back from the Exxon spill and now more are affected from the Gulf. These animals are coming with contaminants and spreading the concern to the food chain. So will the contamination spread to our people dependent on the food chain. I worry that oil and gas exploration and development activities will contaminate the birds, eggs, and other parts of the food chain that would negatively affect the health, both general and reproductive, of the people, myself and my family, who rely on these foods. I worry for the grown children I once taught basketball (“the little dribblers”) who are now of reproductive age who have asked me reproductive health questions.

Many are having problems and fear the contaminants are affecting the health of our children. Some vent their fears and frustrations about what's happening to our lands and waters, to our health, on Facebook. I have pushed to get the data for the chemicals the oil and gas companies are releasing into our environment, but the government still has not collected it and shared it with us. We should have the quality of the data on these chemicals comparative to what is available in the European Union. There should be no more oil and gas lease sales and activities allowed in our waters and on our lands until we have that information.

66. I am concerned there is a lack of effective Arctic standards for spill response and recovery, and a lack of appropriate testing of those standards. I am also concerned that there is a lack of understanding by those who want to conduct oil and gas exploration drilling and by those who are allowing oil and gas drilling in the Arctic of the need for effective standards. I am concerned that because of a lack of standards, there may be a greater likelihood that an oil spill could occur and that any recovery efforts will not be adequate to clean up a spill. I am concerned that we, our local leadership and community members, will now need to learn about engineering and controls so that we can understand the spill plans and whether they effectively protect our lands and waters, and how safety measures for the Arctic can be improved to ensure our lands and waters are protected. I am concerned about how Alaska and the people of the North Slope, in particular, will be the ones who will be forced to address and respond to any problems that arise from oil and gas exploration and development. And I am worried that the need to protect public health, reduce energy consumption, restoration of areas impacted by industrial oil and gas activities and exploration should be an integral part of the planning process and not an afterthought. I am concerned when I see that many states are less than transparent in addressing the public's concerns with oil and gas development and how difficult it is to research the impacts

that oil and gas development have on public health. Many people are researching and building the evidence of health concerns and suffering from oil and gas development in health impact assessments, and they are living with the reaction of not using precaution designed into the process. Precaution to human health must be designed in the permitting and leasing processes and not as a result of the loss of life and lawsuits. Prevention must be the basis of the effort, not added when the evidence builds. Proactive assessment of all areas of industry to reduce emissions should be a continuous process of every permit and not a plan to find funding eventually. Reducing energy consumption must be the goal of every permit, we should not be permitting on the design of the industry that produces and consumes the energy. Every impacted area must be planned for restoration as part of every permit and we should not have to wait to plan and budget with other funding streams such as the helium process for restoration of the legacy wells as we did in Umiat.

67. There are many oil development projects happening on the North Slope. In order to have a voice in the process, I must devote considerable time to learning about these many projects. I am forced to learn about complex development plans and projects that are very different than our traditional and cultural activities. To make sure we are involved in the decision-making processes and to educate decision-makers about our lands and waters, I have attended many meetings and conferences with local, regional, state and federal agencies, and industry. I have had to learn about NEPA, regulatory and enforcement processes, pipeline safety, environmental health and chemical toxins, and how to respond if there is an oil spill. I am told that I must have training in oil spill response just to access traditional and cultural areas that have become developed by the oil industry. I have travelled many miles to visit villages along the North Slope to give presentations at schools, tribal and city councils, and

communities that share facts and knowledge about these projects and their impacts on our communities that may not have been shared by the industry or the state and federal agencies. I have to do all of this voluntarily to be an informed community member to comment effectively at local community meetings where development plans are presented. I feel that I must spend this time in order to protect the wildlife and the environment that provide food for me and my family. I would rather spend this time gathering food, hunting, or enjoying my friends and family.

68. Because of the increasing presence of oil and gas development projects in the Arctic, I feel that we have to become educated in our traditions and culture and in the technical and scientific world to keep pace. Because the decisions about these projects are important to our future, we have to try to be engaged in so many processes that seem to be beyond our control. I feel that we have to try to learn from others who have experienced oil spills in order to help us prepare to assess the potential damages that could result from spill in the Arctic. We have to read and assess volumes and volumes of documents and work to that oil and gas development project won't negatively affect in an area of traditional and cultural use and the animals we depend on or prevent our usage of an area for generations. I feel that we have to participate in many meetings to try to get answers to our questions and concerns about impacts from oil and gas development and its associated effects like oil spills. We try to make our concerns known during decision-making processes in the hope that the impacts to us and our traditional and cultural uses will be reduced. The stress and strain of these efforts are very tiring. But, our traditional and cultural activities are very important, so I feel we must do this work even though it brings additional stress and strain. I feel we have to endure the pain and hardship of these efforts to be involved in the decision-making process and to deal with bad decisions so that

we have hope that our future generations will be able to practice our traditional and cultural activities as we do now.

69. We want to be Inupiat into the future not just residents in an industrialized area. We want our health and our culture and traditions to continue into the future, but these are jeopardized by the decisions of the Federal government to continue to lease our lands and waters to oil companies and allow more and more oil and gas exploration and development activities here. The government makes these decisions without consulting with us, without our permission, without looking at the cumulative impacts they have on our lands and waters and our people. The seasons of life and land are so intertwined for our people that I worry that these decisions, and all things that can follow from them, including a devastating oil spill, worsening climate change, more air and water pollution, and decreased animal populations will affect us for generations. The cumulative impacts from all the piecemeal decisions made by various administrations, including the current one, are devastating our communities and threatening the life, health, safety, and traditional culture of our people. After decades of involvement and engagement in these complex issues, efforts to protect our lands and waters, we are just seeing more lease sales and exacerbated changes which are affecting our way of life and breaking our communities apart. Instead of more oil and gas lease sales and permitted activities in our waters and on our lands, we demand policies, processes, and decisions that are preventive, precautionary, protective, and proactive, ones that serve the long-term interests of our people and the Arctic, and that feed us with goodness instead of badness left behind by oil companies.

70. The North Slope is my home, and I plan to stay here as long as I live. I will continue to hunt, fish, boat, and camp with my family and share our cultural traditions and practices every year as I have in the past. I will continue to encourage my children and

grandchildren to educate and involve themselves in local issues, and to fight for our life, health, safety, and traditional culture as our elders have directed us to do.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Dated: June 7, 2018

By: Rosemary Ahtuanguak
Rosemary Ahtuanguak